

Process description of the complaints procedure in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG)

Supplement to the policy statement on DLR's Human Rights Strategy

DLR has set up a **freely accessible whistleblower system** through which employees and third parties can, at any time, report human rights or environmental risks and violations of human rights-related or environmental obligations caused by DLR, by DLR's direct or indirect suppliers or other DLR collaboration and business partners.

Whistleblowing reports should be addressed to **Sorgfaltspflichten[at]DLR.de**. Incoming messages are forwarded directly to the DLR Human Rights Officer and their representative, the Human Rights Expert. The recipients are impartial, independent and are not bound by any instructions regarding their review of the reported information. They are obliged to maintain secrecy. Messages are always treated confidentially and, upon request, anonymously. Protection against discrimination or punishment based on a complaint is guaranteed.

Receipt of the message is confirmed immediately and automatically. The DLR Human Rights Officer or their representative will then contact the whistleblower and discuss the information provided within seven working days. Complaints about serious violations of human rights and environmental obligations are treated with priority and the DLR Executive Board is informed accordingly, **while maintaining the confidentiality or anonymity requested by the whistleblower**. Throughout the procedure, the person providing the information (the whistleblower) is informed transparently and comprehensibly about the process and progress made. The corresponding measures will be communicated within 90 days. If possible, the measures to be taken will be devised in consultation with the whistleblower. Evaluation of the measures should also be carried out together with the whistleblower. If they consent, they will be contacted again following implementation of the measures and asked about their satisfaction with the process and outcome.

Anyone wanting to make an **anonymous** report should use the functional email address*) **Complianceanonym[at]DLR.de**. DLR's Human Rights Officer and their representative for compliance matters have access to this email account. The assurances mentioned above (confidentiality, etc.) also apply here. It should be noted, however, that the aforementioned practice of discussing progress with the whistleblower will not be possible in the case of an anonymous tip.

In addition to the functional email address, all DLR employees and third parties have the opportunity to contact the DLR Human Rights Officer or the Human Rights Expert directly at any time with questions and comments, **by telephone or email**. You can find the contact details on this website.

The **effectiveness of the complaints procedure** is reviewed annually by DLR. Among other things, this review should include the results of the risk analysis with the aim of improving accessibility to the procedure, especially for those potentially affected.

**) Technical information about the anonymous whistleblower system: First, the whistleblower's email goes to the first email relay for the DLR.de domain. This is a server called mailhost.dlr.de. On this mail host, the sender address can still be seen in plain text. From there, emails to Compliance-anonym[at]DLR.de then branch to the server on which NoSpamProxy is installed. There the sender address is anonymised and forwarded to the host with the name smtprelay.dlr.de. From this point on, the sender address is encrypted for all subsequent systems.*

The owners of the functional mailbox for anonymous reports of compliance/LkSG violations respond to the whistleblower's email but can only see the encrypted email address. DLR's mail server is configured so that it must always send such emails to NoSpamProxy. There, the encrypted address is converted back into the correct address.

NoSpamProxy is set so that the email with the plain text recipient is delivered directly to the recipient's email server. No other email server of the DLR or its IT service provider is involved.

Message tracking on the NoSpamProxy server is disabled. This means that even an administrator with access to NoSpamProxy cannot see who the whistleblower is.